



RICHARD LOVELL

05/10/2007 04:11 PM

To: JIM BONOMO/AM/MITSUBISHI CORP@MITSUBISHI CORP
cc: cpalmieri@liddlerobinson.com
jliddle@liddlerobinson.com
bcc:
Subject: Re: document preservation/meeting reminder

NYC/GMD

Jim

Yours noted. Sorry you have decided not to participate in the investigation as called for in our policy.

Regards

Rich

Richard B. Lovell
SVP, Human Resources Director
Mitsubishi International Corporation
655 Third Avenue
New York, NY 10017
212 - 605-2034
richard.lovell@mitsubishicorp.com



JIM BONOMO

05/10/2007 03:10 PM

To: RICHARD LOVELL/AM/MITSUBISHI CORP@MITSUBISHI CORP
cc: jliddle@liddlerobinson.com
cpalmieri@liddlerobinson.com

NYC/GAD

Subject: Re: document preservation/meeting reminder



DEF0000351

Richard,

Please direct any questions/inquiries you may have to the Attorneys representing me.

Thanks,

Jim Bonomo
Manager, Paper Sales
Mitsubishi International Corp.
655 Third Ave.
New York, N.Y. 10017
Tel. 212-605-2577
Fax 212-605-1869
e-mail: jim.bonomo@mitsubishicorp.com

5/10/2007 1:22:30 PM RICHARD LOVELL/AM/MITSUBISHI CORP wrote:

>
>Jim
>
>As a reminder, and as your lawyer has probably already told you, once a draft
>
>claim complaint is mailed that threatens litigation, the parties have an
>obligation to preserve relevant information. In light of the claims you raised
>
>in the draft complaint mailed to MIC, you have an obligation to preserve all
>documents and data regardless of form, electronic (including PCs, lap tops,
>blackberries etc) or otherwise, inclusive of calendars, memos, etc that relate
>
>in anyway to the facts, claims, defenses etc relative to your draft complaint.
>
>The duty to preserve this information covers all
>devices, records etc. you have in your possession and /or over which you
>have custody and control whether at home or at work.
>
>Per my earlier e-mail, I will see you Monday at 2, pending any need you
>may have to adjust the schedule, so I can investigate your claims as required
>
>under our policy. Again, if the date and/or time doesn't work, please let me
>know, in advance, and we can rearrange the schedule.
>
>Regards
>
>Rich
>
>
>Richard B. Lovell
>SVP, Human Resources Director
>Mitsubishi International Corporation
>655 Third Avenue
>New York, NY 10017
>212 - 605-2034
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